

Lincoln City-County Board of Health

418 Mineral Ave
Libby, MT 59923



March 15, 2018

EPA Administrator
USEPA Headquarters
William Jefferson Clinton building
1200 Pennsylvania Ave. NW
Mail Code: 1101A
Washington, DC 20460

Dear Administrator Pruitt,

On behalf of the City-County Board of Health, I am writing to express our concern about EPA's Scope of Risk Evaluation to be conducted for asbestos which was released in June of 2017. The Amended Toxic Substances Control ACT (TSCA) timelines did not allow time for public comment on this document; however, we feel that public input is vital on the scope of risk evaluation.

In particular we are very concerned that Libby Amphibole and legacy asbestos have not been included in the scope of the asbestos risk evaluation. The community of Libby, Montana, has been severely impacted by exposures to Libby Amphibole enduring thousands of illnesses and hundreds of deaths. Many affected were only exposed through environmental or household contact. EPA's IRIS has confirmed that Libby Amphibole is carcinogenic to humans, and that non-cancer health effects can occur at very low exposure levels. The Libby mine produced nearly 3.5 million tons of Libby Amphibole-contaminated vermiculite that was distributed all over the country. In addition Libby Amphibole-contaminated Zonolite attic insulation is estimated to be in 25 million American homes.

We strongly encourage EPA to include Libby Amphibole in the scope of asbestos risk evaluation and to consider risks of exposure to legacy asbestos as well. The vast majority of future exposures are likely to come from legacy asbestos sources including Libby Amphibole. To ignore this would be a devastating oversight for the protection of human health on a national scale.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jan Ivers', is written over a horizontal line.

Jan Ivers, Chair
City-County Board of Health
Lincoln County, Montana